

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

Vanida Khautisen, as Personal Representative of )  
the Estate of Khouanexay Bill Sivilay, )

PLAINTIFF, )

v. )

BHG Holdings, LLC, and BHG XXXVIII, LLC, )

DEFENDANTS. )

C.A. No. 7:21-cv-03775-TMC

**DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

Defendants, by and through their undersigned counsel, and pursuant to Rule 56(a) F.R.C.P., respectfully MOVE for Summary Judgment on all of Plaintiff's Causes of Action. Defendants respectfully submit to this Honorable Court that as a matter of law Defendants owed no duty of care to Plaintiff, and all Defendants are entitled to judgment as a matter of law on all of Plaintiff's Causes of Action.

Defendants' Memorandum in Support of their Joint Motion for Summary Judgment will be submitted to the Court, whereby all supporting positions for Defendants' Motion will be set forth.

Respectfully submitted,

HOLCOMBE BOMAR, P.A.

s/Chance M. Farr

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July 20, 2023  
Spartanburg, SC